



**American Water Works
Association**

The Authoritative Resource on Safe WaterSM

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Mr. Thomas Carpenter
U.S. Environmental Protection Agency
Science Advisory Board Perchlorate Panel DFO
(via email)

RE: AWWA Comments on the Science Advisory Board (SAB) Draft Advisory Report on Approaches to Derive a Maximum Contaminant Level Goal for Perchlorate

The American Water Works Association (AWWA) appreciates the opportunity to comment on the SAB's consideration of perchlorate as detailed in the draft report issued on September 5, 2012. AWWA is an international, nonprofit, scientific and educational society dedicated to the improvement of drinking water quality and supply. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our 50,000 plus members represent the full spectrum of the drinking water community: treatment plant operators and managers, environmental advocates, engineers, scientists, academicians, and others who hold a genuine interest in water supply and public health. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation's drinking water. Based on this broad membership base, these comments should be considered as representative of the drinking water community in general.

AWWA is requesting that the SAB reexamine its conclusion that advises EPA to proceed with the development of a maximum contaminant level goal (MCLG) for perchlorate. The draft report indicates that the panel found the available scientific evidence incomplete or deficient for supporting with certainty a scientifically significant assessment of the public health benefit. In the panel's review of the various charge questions we noted the following statements:

- *...evidence is suggestive...*
- *...currently available studies are insufficient to draw unequivocal conclusions regarding the impact of perchlorate exposure on human brain development.*
- *...key evidence linking these features to perchlorate levels, iodine levels, and outcome is lacking.*
- *Perchlorate is likely to have downstream effects...To date, however, no studies exist that have directly examined the relation between perchlorate exposures, its thyroidal impact, and the developing human brain.*
- *...existing data are inadequate for quantitatively estimating reduction in adverse health effects realized in regulating perchlorate in drinking water.*

AWWA values the purpose and objective of the SAB. However, as stated in prior comments (letter dated July 10, 2012), we are concerned with the confidence associated with the SAB's draft recommendation to pursue an MCLG. The panel's assessment provides a sufficient level of doubt with regard to the potential for perchlorate to trigger *inferred* adverse effects that we request a thorough review of the MCLG recommendation. While PBPK modeling is a powerful tool for informing decision makers, it cannot fill the causality data gaps between perchlorate exposure and hypothesized effects.

In addition to the data quality issues associated with the draft recommendation to proceed with an MCLG, it is imperative that the SAB consider the implications of shifting the regulatory construct to a point-of-departure representative of a non-adverse effect. Basing a drinking water standard on a non-adverse effect is unprecedented and has broad implications for the overall regulatory approach. All substances/compounds have some effect on the human body at low levels, but in nearly all cases those effects are not adverse in the context of public health. The long-term effect of this decision has the potential to divert limited resources to actions that seek to mitigate de minimis public health risks.

Furthermore, we recommend that the SAB elevate the underlying public health issue of iodine deficiency as being a worthy focus of federal agency collaboration. Ensuring the iodine sufficiency of the American diet mitigates multiple public health issues and would generate the greatest public good relative to the sensitive populations described by the SAB independent of any goitrogen exposure, including perchlorate.

AWWA appreciates the opportunity to comment on these important drinking water issues. If the SAB Perchlorate Panel has any questions about these comments, please feel to call Kevin Morley or me in our Washington Office at 202-628-8303.

Sincerely,

Tom Curtis
Deputy Executive Director–Government Affairs

cc: Pamela Barr, OGWDW
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